

# **Exhibit B**

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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In re	: Chapter 11
	:
MOTORS LIQUIDATION COMPANY, <i>et al.</i> ,	: Case No.: 09-50026 (MG)
f/k/a General Motors Corp., <i>et al.</i>	:
	:
Debtors.	: (Jointly Administered)
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**SCHEDULING ORDER FOR CERTAIN ISSUES  
RAISED BY THE LATE CLAIMS MOTIONS**

The Court having issued a directive in the *Memorandum and Order Regarding Motion to Enforce the Settlement Agreement By and Among the Signatory Plaintiffs and the GUC Trust* (“**Opinion**”), entered on January 18, 2018 [ECF No. 14212], that the parties file a proposed schedule for litigating the Late Claims Motions;<sup>1</sup> and the Court having reviewed the submissions made by the parties; and upon the record of the scheduling conference held by the Court on February 22, 2018; and after due deliberation and sufficient cause appearing therefore; it is hereby

ORDERED that the following schedule shall apply with respect to the issues identified below that are raised by the Late Claims Motions:

<b><u>ISSUE</u></b>	<b><u>SCHEDULE</u></b>
Initial Late Claim Motions Issues	Oral argument shall take place on _____, 2018, at ____:____.m.
Provided that the Court rules the <i>Pioneer</i> standard applies to some or all claimants that are seeking authority to file late proofs of claim, do some or all of the late claimants satisfy the	(1) Counsel for the claimants shall by _____, 2018 serve on counsel for all other parties the information required by MDL Order No. 108.  (2) The parties shall, by _____, 2018, attempt to stipulate to the dates that any personal injury claim

<sup>1</sup> Terms used herein and not otherwise defined shall have the meanings ascribed to them in the King & Spalding LLP letter to the Court, date February 8, 2018.

<p><i>Pioneer</i> standard for filing late proofs of claim? (“<b><u>Satisfaction of Pioneer Standard Issue</u></b>”).</p>	<p>was: (a) first made to Old GM or New GM, (b) filed in the MDL or in state court, or (c) submitted to the GM Ignition Compensation Claims Resolution Facility (including facts related to the nature and timing of any decision or disposition by the GM Ignition Compensation Claims Resolution Facility).</p> <p><b><u>Briefing Schedule:</u></b> (i) simultaneous opening briefs on the Satisfaction of <i>Pioneer</i> Standard Issue shall be filed no later than 30 days after the completion of (1) and (2) above; and (ii) simultaneous reply briefs shall be filed no later than 21 days after the opening briefs are filed.</p> <p><b><u>Oral Argument:</u></b> To be set by the Court after briefing is complete.</p>
<p>Whether it is too late for claimants without the Ignition Switch Defect (both economic loss and personal injury) to attempt to establish a due process violation with respect to Old GM’s notice of the Claims Bar Date? (“<b><u>Due Process Timeliness Issue</u></b>”).</p>	<p><b><u>Briefing Schedule:</u></b> The briefing for this issue shall be included in the briefs submitted in connection with the Satisfaction of <i>Pioneer</i> Standard Issue.</p> <p><b><u>Oral Argument:</u></b> To be set by the Court after briefing is complete.</p>
<p>Whether the AM Claimants represented by Andrews Myers are time-barred from seeking authority to file late proofs of claim? (“<b><u>AM Claimants Timeliness Issue</u></b>”).</p>	<p><b><u>Interrogatories:</u></b> The interrogatories previously authorized by this Court shall be supplemented and served on counsel for the AM Claimants within five (5) business days of the entry of this Order. The AM Claimants shall have 30 days from the date of service of the supplemented interrogatories to serve responses thereto (“<b><u>Interrogatory Response Date</u></b>”).</p> <p><b><u>Briefing Schedule:</u></b> The briefing for this issue shall be included in the briefs submitted in connection with the Satisfaction of <i>Pioneer</i> Standard Issue.</p> <p><b><u>Oral Argument:</u></b> To be set by the Court after briefing is complete.</p>

and it is further

ORDERED that the claimants identified in the Goodwin Proctor Late Claims Motion that have not responded to the previously Court-authorized and served interrogatories shall, within ten (10) days of this Order being entered by the Court, serve responses to the interrogatories; and it is further

ORDERED that counsel for the personal injury claimants shall file with the Court, within five (5) business days of this Order being entered by the Court, a statement setting forth only those claimants that seek authority to file late proofs of claim, omitting all withdrawn and to be withdrawn claimants, and those claimants that previously filed timely proofs of claim or had their claims otherwise resolved; and it is further

ORDERED that the hearing on the approval of the Forbearance Agreement shall be held on February \_\_, 2018 at \_\_:\_\_ .m; and it is further

ORDERED that this Court shall retain exclusive jurisdiction to interpret and enforce this Order.

Dated: February \_\_, 2018  
New York, New York

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UNITED STATES BANKRUPTCY JUDGE